



**THE CITY OF NEW YORK
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BY ECF

Honorable Sterling Johnson, Jr.
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Jemal Earle v. City of New York, et al., 16-cv-0171 (SJ)(RML)

Your Honor:

I am a Senior Counsel assigned to the defense of this matter on behalf of defendants. I write jointly on behalf of the parties to respectfully request an extension of the deadline by which the parties are to file their cross-motions for summary judgment in this matter. The parties' cross-motions for summary judgment are currently due on June 3, 2019, opposition papers are due on July 3, 2019, and reply papers are due on July 17, 2019. The parties respectfully request that the Court move the briefing schedule by 30 days, so that moving papers are due on July 3, 2019, opposition papers are due August 5, 2019, and reply papers are due August 19, 2019. This change in schedule should not affect the status conference scheduled in this matter for October 4, 2019. This request is made, in part, so that the parties may explore the possibility of settlement of this matter.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/

Angharad Wilson
Senior Counsel

cc: All Counsel (via ECF)